U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION/SITUATION REPORT

STT Subbase Oil Spill - E18204 - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region II

Subject: POLREP #14

STT Subbase Oil Spill - E18204

Z2CA

St Thomas, VI

Latitude: 18.3324693 Longitude: -64.9602165

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From: Kimberly Staiger, OSC

Date: 3/25/2018 **Reporting Period:** March 25, 2018

1. Introduction

1.1 Background

Site Number: Z2CA Contract Number: EP-S2-15-02

D.O. Number: 75 Action Memo Date:

 Response Authority: OPA
 Response Type:
 Emergency

 Response Lead:
 STATE
 Incident Category:
 Removal Action

NPL Status: Non NPL Operable Unit:

Mobilization Date: 3/12/2018 Start Date: 3/12/2018

Demob Date: Completion Date: CERCLIS ID: RCRIS ID:

ERNS No.: State Notification:

FPN#: E18204 Reimbursable Account #:

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

On February 16, 2018, the Puma facility discovered a loss of 2,354 gross gallons from Tank 32157 (Tank 57). The loss consisted of 1,494 gallons of water and 860 gallons of gasoline. According to documentation provided by Puma, the water inside Tank 57 came from a receiving pipeline during the transfer of product from the pier in Crown Bay to the terminal on February 10, 2018 as part of their normal operating procedure.

On Saturday, March 3, 2018 at approximately 4 pm, vapors within a concrete vault located near the Puma facility in the Subbase area of St. Thomas ignited resulting in a flashover. VIPD responded and found three concrete vaults containing petroleum product and water. Two vaults house electrical transmission lines

owned by WAPA and an abandoned vault owned by Viya. Approximately 6,000 gallons of petroleum and water mixture has been pumped from the vaults. The vaults continue to fill with a petroleum/water mix. The source of the discharge is unknown and there are several potentially responsible parties located in the area.

A continuous discharge of an unknown petroleum into Krum Bay was observed. The discharge is from a 12" storm drain pipe, as well as groundwater seepage of petroleum product into the Bay. Based upon the proximity of the three utility vaults and the consistency of the petroleum product observed within the vaults and Krum Bay, the incidents appear to be related.

1.1.2.1 Location

Subbase Road and Krum Bay.

1.1.2.2 Description of Threat

Oily product is actively discharging into Krum Bay from an unknown source, and vapors from the discharge that are within nearby utility vaults are creating a safety hazard.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On Saturday, March 3, 2018 at 4pm vapors within a concrete vault ignited resulting in a flashover, which resulted in a power failure to St. Thomas and St. John. The vault sits adjacent to the Puma facility fenceline in the Subbase area of St Thomas. VITEMA, WAPA, DPNR, VIFD and VIPD responded to investigate the cause of the explosion and found three concrete vaults containing petroleum product and water. Two vaults house electrical transmission lines owned by WAPA and one is an abandoned vault owned by Viya (phone/cable). The two WAPA vaults and Viya vault were completely filled with a petroleum/water mix. DPNR contacted a local contractor to vac out the vaults. Approximately 3,900 gallons of fuel and water mixture was pumped from the vaults on Saturday. After pumping, approximately 10" of product/water remained in the Viya vault. DPNR gave a verbal order to the Puma facility to close all valves and cease operations until further notice.

Two concrete vaults are located below the public roadway near the WAPA Randolph Harley plant. The remaining vault is located off the roadway immediately adjacent the Puma facility. The vault adjacent to the Puma facility is where the flashover occurred.

On Monday, March 5, 2018, EPA, DPNR, VITEMA, WAPA, VIPD, USCG and Puma were all on site investigating the source of the leak. DPNR and the USCG collected samples from all the tanks on the Puma facility, from all three concrete vaults, from WAPA's fuel tank, from the Patrick Charles trucking facility (used oil tank and stained soil) and the outfall in Krum Bay for fingerprint analysis. The fingerprint analysis will also help confirm that the discharge into Krum Bay is related to the discharge into the concrete vaults

Puma contracted with a local company to remove product from the Viya vault on Tuesday, March 6th to prevent a future flashover. Approximately 2,600 gallons of petroleum/water mixture was removed from the vault and is currently being stored in an iso tank on Puma property. Puma has placed and is currently maintaining hard curtain boom near outfall in Krum Bay as well as sorbent boom to capture any product on the surface of the water. DPNR conducted an inspection of the Puma facility on Monday, March 5th focusing on any spills or incidents that have occurred at the facility that could potentially be contributing to the petroleum discharges observed within Krum Bay and the utility vaults.

The Patrick Charles trucking facility is currently staging trucks alongside the roadway on an unpaved area. There is significant oil staining beneath the trucks leading to a nearby storm drain. A walk through of the Patrick Charles facility conducted on Monday, March 5th revealed sloppy housekeeping and oil soaked soils throughout the facility. On March 6th at approximately 1440 hours, USCG and EPA observed a spill of oil from one of the parked trucks onto the road surface and entering the adjacent storm sewer. In addition, the adjacent WAPA facility maintains a diesel tank and is located within close proximity to Krum Bay.

On Monday, March 5th, DPNR requested EPA assistance to review Puma's SPCC plan and to conduct air monitoring to determine if the vapors within the vaults was creating an unsafe work environment for responders and neighboring businesses. On Tuesday, March 6th, EPA returned to the site to provide air monitoring support. Air monitors were staged in front of the Department of Public Works yard, at the intersection closest to the two vaults beneath the public roadway, and one at the barricades set up to block traffic from entering the area. LEL readings were at 0% on all monitors, and occasional spikes of VOCs up to 560 ppb were observed on the monitor closest to the manholes. Average VOC readings on the monitor closest to the Puma facility and DPW was 340 ppb at the mouth of the manhole at ground level, and the remaining two monitors averaged 40 ppb and 0 ppb.

Puma continues to conduct air monitoring in the area of the three concrete vaults located near the Puma facility in Subbase as per their air monitoring plan which was submitted to DPNR. LEL readings have consistently been 0% on all monitors, and occasional spikes of VOCs at the manholes have been observed.

On March 9, 2018, an oily liquid was observed leaking from the sanitary sewer manhole near the WAPA vault. According to an employee in the DPW yard, the pump house for the sanitary sewer was shut down on March 3rd for precautionary reasons which is now causing the sanitary to overflow. Sorbent pads were placed over the oily discharge to prevent it from entering the nearby storm drain. Once the pump house was operating, the discharge ceased.

As part of the spill investigation, DPNR placed dye into a storm drain located near the loading rack on the Puma facility. Dye testing confirmed that the storm drain on the property discharges to Krum Bay from the storm water outfall where an active oil discharge is occurring.

On March 9, 2018, EPA opened the Oil Spill Liability Trust Fund (OSLTF) due to concerns that the source of the discharge into Krum Bay is from an inland source within EPA's response jurisdiction.

EPA is the lead FOSC for the response. EPA will continue to coordinate activities with DPNR.

2. Current Activities

2.1 Operations Section

Actions to Date:

On March 25, 2018, EPA and ERRS arrived on site and conducted air monitoring in all the utility vaults to confirm that the work area was safe to enter and perform the spill investigation.

At 1100 hours, a heavy rain event occurred. EPA and ERRS observed the overland sheet flow of storm water from Puma and neighboring properties located upgradient of Krum Bay. Stormwater ran along gulleys adjacent the road into the storm drains as well as entering Krum Bay directly from the boat ramp.

During the heavy rain event, an active discharge of an oily black product could be observed seeping from groundwater discharges into the Bay. The force of water discharging from the 12" stormwater outlet caused the sheen to escape the curtain boom that had been placed into the bay. After approximately 20 minutes of rain, an oil slick could be observed along the bulkhead of Krum Bay. Sorbent pads were placed into the bay, and the sorbent boom was replaced; however, due to the strength of the flow into the bay, oily product escaped the boom.

In addition to notifying the NRC (Report #1207632) about the observed oil slick and active discharge of product into the Bay that was escaping the boom, EPA notified DPNR personnel about the changed conditions and observed discharges into Krum Bay.

EPA collected a sample of the oily product from a pooled area along the bulkhead. The sample will be sent to the COIL lab for analysis to determine the potentially responsible party.

2.2 Planning Section

2.2.1 Anticipated Activities

EPA has a planned conference call with USCG on March 26, 2018 to discuss current conditions in Krum Bay and the oil spill investigation activities.

2.2.1.1 Planned Response Activities

EPA will continue to work with federal and territorial partners to investigate and remediate the source of the continuous discharge.

2.2.1.2 Next Steps

EPA expects to receive the fingerprint analytical results from the USCG this week, and will discuss planned actions to address the active discharge with territorial partners in order to develop a remedial action plan.

A representative from NPFC will be on site on Tuesday, March 27, 2018 to observe current conditions.

2.3 Logistics Section

Not applicable

2.4 Finance Section

2.4.1 Narrative

Initial \$50,000 was received from NPFC on Friday, March 9, 2018. On March 25, 2018, the ceiling was increased to \$80,000.

* There is an error with the estimated indirect cost from NPFC. NPFC has been notified. The costs will be updated at a later date.

Estimated Costs *

| | Budgeted | Total To Date | Remaining | % Remaining |
|---------------------------|-------------|------------------|-------------|----------------|
| Extramural Costs | | | | |
| ERRS - Cleanup Contractor | \$25,000.00 | \$21,004.00 | \$3,996.00 | 15.98% |
| Intramural Costs | | | | |
| USEPA - Direct | \$40,061.00 | \$31,700.00 | \$8,361.00 | 20.87% |
| USEPA - InDirect | \$10,939.00 | \$7,925.00 | \$3,014.00 | 27.55% |
| | | | | |
| Total Site Costs | \$76,000.00 | \$60,629.00 | \$15,371.00 | 20.23% |

^{*} The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

USEPA, Region 2

DPNR

USCG

VIPD

VIFD

VITEMA DPW

4. Personnel On Site

ERRS -1 EPA - 2

5. Definition of Terms

DPNR - Department of Planning and Natural Resources

VIFD - Virgin Islands Fire Department

VITEMA - Virgin Islands Territorial Emergency Management Agency

DPW - Department of Public Works

WAPA - Water and Power Authority

VIPD - Virgin Islands Police Department

NRC - National Response Center

EPA - U.S. Environmental Protection Agency

USCG - U.S. Coast Guard

ERRS - Emergency and Rapid Response Services (EPA Contractor)
SPCC - Spill Prevention and Control and Countermeasure
OSLTF - Oil Spill Liability Trust Fund

LEL - Lower Explosive Limit

VOC - Volatile Organic Compound

6. Additional sources of information

6.1 Internet location of additional information/report

Previous reports and information can be found at: response.epa.gov/subbaseoilspill

7. Situational Reference Materials

Pictures of current conditions in Krum Bay can be found on the above website.